

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND  
RECEIVED & FILED

2022 AUG 24 P 2:49

Suzanne M. Brown  
Plaintiff

v.

Kimberly Rieger, Chief U.S. Probation Officer  
United States Probation and Pretrial Services  
District of Maine  
(Agent of the United States Justice Department,  
Bureau of Prisons, Northeast Residential Reentry Management,  
Field Office, Philadelphia, PA)

Civil No:

**MOTION FOR RELEASE FROM INCARCERATION**  
**(SUMMARY JUDGMENT)**  
**RULE 65 TEMPORARY RESTRAINING ORDER**  
**EMERGENCY/PRELIMINARY AND PERMANENT**  
**INJUNCTIVE RELIEF SOUGHT**

NOW COMES Plaintiff Suzanne Brown and states as follows:

**Case Opening Contents:**

1. JS-44 Cover Sheet
2. Application to Proceed In Forma Pauperis (AO 240)
3. Affidavit of Assets and Liabilities (included in AO 240)
4. Motion and Certificate of Service
5. Plaintiff Declaration (Exhibit 1)
6. Memorandum of Law (Exhibit 2)
7. Exhibits 3-6

**Background and Summary:**

Please see Plaintiff Declaration (Exhibit 1)

**Jurisdiction and Venue**

Please see Memorandum of Law (Exhibit 2)

**Administrative Remedy—Exhaustion Not Required**

Please see Memorandum of Law (Exhibit 2)

**Summary Judgment**

Please see Memorandum of Law (Exhibit 2)

**Temporary Restraining Order / Preliminary & Permanent Injunction**

Please see Memorandum of Law (Exhibit 2)

**Pro Se Considerations**

1. Plaintiff respectfully requests an extra measure of solicitude for pro se pleadings that may not conform to the Court's exacting standards of form and content.
2. Plaintiff would gratefully accept appointment of competent counsel under the Criminal Justice Act should the Court deem it necessary in the interest of justice and/or judicial economy. Plaintiff understands there is no post-conviction 6th Amendment right to counsel.

**Prayer for Relief**

WHEREFORE, Plaintiff Suzanne Brown prays for relief as follows:

**Permanent Injunctive Relief:**

1. Recalculation of First Step Act Credits no later than September 1, 2022, to reflect the full 120 days' reduction of sentence; adjusted release date of September 2, 2022.
2. Release from incarceration (home confinement) no later than September 2, 2022;
3. Commencement of supervised release no later than September 2, 2022;
4. Permission to travel nationwide and internationally for work (as a composites engineer and boat/yacht builder) no later than September 2, 2022;
5. Permission to appear via videoconference for any Court proceedings, distance from home to Court being 80 miles.
6. Waiver of Rule 65(c) requirement for security, due to indigent status;
7. Permission to petition the United States Department of State for the return and renewal of passport;
8. Any other relief the Court finds just and proper.

**Alternative/Additional Relief:**

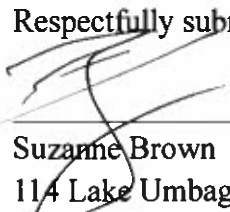
**Temporary Restraining Order and/or Preliminary Injunctive Relief**

[September 2, 2022, (corrected release date with FSA credits) to December 17, 2022, (presently incorrectly-reported BOP statutory release date)]

1. Temporary restraining order and/or temporary injunction terminating incarceration;
2. Permission to remove ankle-mounted location monitor;
3. September 1-5, 2022: permission to attend the 35th-year class reunion at the United States Naval Academy;
4. September 1-5, 2022: permission to retrieve the commercial work vehicle parked at Plaintiff's godparents' in Westampton, New Jersey, near FDC Philadelphia [vehicle driven January 3, 2022, to report to FDC Philadelphia [FDC flew Plaintiff (required as condition of release) back home August 2, 2022, and would not allow retrieval of the vehicle, which is required for self-employment work];
5. Permission October 20-24, 2022, permission to attend Cornell University Family Weekend to visit Plaintiff's son, a first-year student;
6. Permission to reside and work in self-employment from Plaintiff's permanent legal residence at 114 Lake Umbagog, Errol NH;

7. Permission during September or October 2022, to travel for work to/from Maine to Colorado to retrieve a client's 1986 E-350 van for restoration work (campervan conversion);
8. Permission to travel nationwide for work from Plaintiff's home/shop in Errol, NH;
9. Permission to attend other work and family functions/events (e.g. Thanksgiving) with notification to the probation office;
10. Any other relief the Court finds just and proper.

Respectfully submitted,



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Suzanne Brown  
114 Lake Umbagog  
Errol, NH 03579  
greatnorthwoodsfarm@gmail.com  
(603) 828-4860

Date: AUGUST 24, 2022

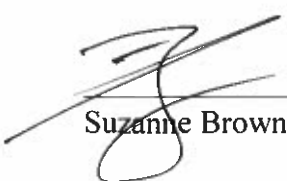
**CERTIFICATE OF SERVICE**

I, Suzanne Brown, representing myself, do hereby certify under penalty of perjury, that on this 24th day of August, 2022, I served a copy of the foregoing on the opposing side by mailing/hand delivering a copy thereof to:

Kimberly Rieger  
United States Probation and Pretrial Services  
District of Maine  
Post Office Square  
400 Congress Street, 5th Floor  
Portland, Maine 04101

Darcie McElwee  
United States Attorney  
District of Maine  
100 Middle St., #6  
Portland, ME 04101

Northeast RRM Philadelphia  
2nd and Chestnut St., 7th Floor  
Philadelphia, PA 19106

  
Suzanne Brown

Date: AUGUST 24, 2022

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